

Approved: Marcia S. Cohen  
 Marcia S. Cohen  
 Assistant United States Attorney

ORIGINAL

Before: HONORABLE JUDITH C. MCCARTHY  
 United States Magistrate Judge  
 Southern District of New York

20 mag 2232

- - - - -	x	<u>AMENDED COMPLAINT</u>
	:	
UNITED STATES OF AMERICA	:	Violation of
	:	18 U.S.C. § 2422(b)
-v.-	:	
	:	COUNTY OF OFFENSE:
LELAND ROBINSON,	:	Westchester County
Defendant.	:	
- - - - -	x	

SOUTHERN DISTRICT OF NEW YORK, ss.:

Pao Mei Fisher, being duly sworn, deposes and says that she is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE

From in or about August 2019, up to and including on or about October 24, 2019, in the Southern District of New York and elsewhere, LELAND ROBINSON, the defendant, using facilities and means of interstate and foreign commerce, unlawfully, willfully, and knowingly persuaded, induced, and enticed, and attempted to persuade, induce, and entice, an individual who had not attained the age of 18 years to engage in sexual activity for which a person can be charged, to wit, LELAND ROBINSON, the defendant, via online communications, persuaded, induced, and enticed a 14-year-old minor ("Victim-1") to meet ROBINSON to engage in sexual activities.

(Title 18, United States Code, Section 2422(b).)

1. I am a Special Agent with the Federal Bureau of Investigation ("FBI"), assigned to the FBI Westchester Resident Agency. I have been a Special Agent with the FBI since January 2017. I have participated in investigations involving crimes against children, including the receipt, possession, and/or distribution of child pornography by electronic means, sexual exploitation, and enticement of minors. I have gained expertise in these areas through training and daily work related to conducting these types of investigations.

2. I have been personally involved in the investigation of this matter. This affidavit is based upon my conversations with law enforcement officers and others, and my examination of reports and records. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

3. In or about January 2020, the FBI received information from the New Canaan Police Department ("NCPD") concerning events involving LELAND ROBINSON, the defendant, a 31-year-old male. Based on my conversations with an NCPD Detective ("Detective-1") and my review of reports prepared by the NCPD, I am aware that:

a. On October 24, 2020, at approximately 7:45 p.m., officers from the NCPD responded to a street ("Street-1") in New Canaan, Connecticut, following a report of a suspicious male in the area. The officers approached a male, later identified as LELAND ROBINSON, the defendant, and asked him where he was coming from. ROBINSON said that he had been at a friend's house and that he was going to order a car service but his phone had died. ROBINSON said that he needed to get home because his mother was going to be mad at him and he had homework to get done. ROBINSON indicated that he was walking to a house to pick up his backpack, but when asked the address of the house, he indicated that he did not know it. The officers asked ROBINSON for identification and he said that he did not have any on him. ROBINSON provided a first name of "Shannon" and a date of birth in June 2001. Notwithstanding the date of birth provided, ROBINSON stated that he was going to be 18, but was not yet 18.

b. Thereafter, ROBINSON was transported to the NCPD. Eventually, he advised that his name was "Leland Robinson" and

that he had lied about his age because he was scared. ROBINSON provided various versions of the events that had occurred before the officers stopped him. Among other things, he said that he had agreed to sell a Juul to a boy and he provided the boy's first name.

c. Ultimately, ROBINSON was charged with Interfering with an Officer/Resisting and advised that he needed to appear in Norwalk Superior Court on October 31, 2019. Before his release from police custody on October 24, 2019, ROBINSON provided his home address ("Address-1") in Mount Vernon, New York.

4. Based on my conversations with a detective at the NCPD ("Detective-1") and my review of reports prepared by the NCPD, I am aware that a minor ("Victim-1"), who was 14-years-old in October 2019, who has the same first name as the name of the boy to whom ROBINSON said he agreed to sell a Juul, advised the NCPD the following, among other things:

a. Over an approximately two-month period in or about August to October 2019, Victim-1, who was then 14-years-old, communicated with a male via Snapchat and text messages.

b. Victim-1 agreed to meet with the male on October 24, 2019 to provide sexual favors to the male in exchange for a Juul. Victim-1 gave the male his home address in Connecticut. Victim-1 lives at a residence on Street-1. In their communications, the male told Victim-1 that he wanted to have sex with him and that he wanted to kiss him.

c. The male sent Victim-1 a photo of the male's penis.

d. On October 24, 2019, the male met Victim-1 in the area outside Victim-1's house and he performed oral sex on Victim-1.

5. I am aware that, on or about November 13, 2019, LELAND ROBINSON, the defendant, was charged in Connecticut with Sexual Assault and Risk of Injury to a Minor, and a warrant was issued for his arrest.<sup>1</sup>

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<sup>1</sup>On January 6, 2020, FBI agents, assisting Connecticut law enforcement, arrested LELAND ROBINSON, the defendant, in Brooklyn, New York.

6. Based on my conversations with Detective-1 and my review of reports prepared by the NCPD, I am aware that Victim-1 provided his cellphone ("Phone-1") to the NCPD, and that the NCPD, subsequently, conducted a forensic analysis of Phone-1. I have reviewed the results of that analysis. The analysis revealed the following, among other things:

a. A photo of an erect penis was sent to Phone-1 via Snapchat on October 24, 2019.

b. There are numerous text messages between Phone-1 and a telephone number ending in 6760 (the "6760-Phone"). A message on October 24, 2019 from Phone-1 to the 6760-Phone reads, "Bring the Juul and pods don't forget." The 6760-Phone responds at approximately 3:44 p.m., "I have it with me" and a few minutes later at 3:46 p.m. "OK. Plz don't flake. Love u gonna fuck u the best ever." At 3:49 p.m., Phone-1 texts, "I'll text you when you can order your [car service]." At 3:50 p.m., the 6760-Phone texted, "Love you and ok gonna walk." Phone-1 texted back "[y]ou can't walk to my house." The 6760-Phone responded, "It's a 20min walk from the train station." At 6:23 p.m., Phone-1 texted Victim-1's home address ("Address-1") to the 6760-Phone. At 6:26 p.m., the 6760-Phone texted, "On my way be there soon." At 7:11 p.m., the 6760-Phone texted, "Here" and Phone-1 texted, "Coming." At 7:14 p.m., the 6760-Phone texted, "Wait to i see that sexy ass." At 7:18 p.m., the 6760-Phone texted, "Gonna make u feel so good" and "Cant wait to kiss u again."

c. At 7:54 p.m. on October 24, 2019, the 6760-Phone texted, "That was fun" and, at 7:55 p.m., "Next time im getting deep." Phone-1 texted the following series of messages at 7:59 p.m.: "run" and "My dad called the cops," "You need to hide," "Multiple times," "hide," and "There gonna come and look for you."

7. On or about February 18, 2020, Victim-1 was interviewed by an FBI forensic interviewer. I was able to observe and hear the interview as it occurred. Among other things, Victim-1 advised the following, in substance and in part:

a. The communications between Phone-1 and the 6760-Phone were Victim-1's communications with LELAND ROBINSON, the defendant.

b. In addition to communicating by text, Victim-1 and ROBINSON also communicated by Snapchat and Facetime.

c. During his communications with ROBINSON, prior to meeting him on October 24, 2019, Victim-1 told ROBINSON that he was 16 years old.

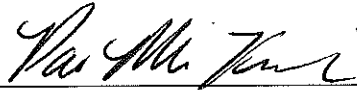
d. Victim-1 received photos and videos from ROBINSON of ROBINSON's penis.

8. In connection with this investigation, I have had conversations with an employee ("Employee-1") of a company located in Brooklyn, New York ("Company-1"). Employee-1 confirmed that LELAND ROBINSON, the defendant, was employed at Company-1 in October 2019 and that Company-1 paid LELAND ROBINSON for work performed in Brooklyn, New York on October 24, 2019. Based on this information, I believe that, when LELAND ROBINSON, the defendant, traveled to Connecticut on October 24, 2019, he traveled from New York. I am aware that Metro North runs trains from New York to Connecticut, and that these trains travel through Westchester County en route to Connecticut.

9. Based on my conversations with Detective-1 and my review of NCPD records, I am aware that NCPD issued press advisories concerning LELAND ROBINSON's initial arrest in October 2019 and the subsequent charges in November 2019. I am aware that these press advisories included a photo of LELAND ROBINSON ("Photo-1"). On or about March 5, 2020, I met with Victim-1 and showed him a series of photographs of various individuals, including Photo-1. Victim-1 identified Photo-1 as a photograph of the person Victim-1 met with on October 24, 2019. Victim-1 also advised that

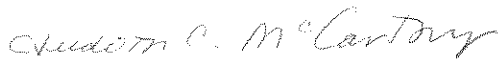
he had seen Photo-1 in online news stories on a number of occasions.

WHEREFORE, deponent prays that the above-named defendant be arrested and imprisoned or bailed as the case may be.



PAO MEI FISHER  
Special Agent  
Federal Bureau of Investigation

Sworn to before me this  
10 th day of March, 2020



Honorable Judith C. McCarthy  
United States Magistrate Judge